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# State of Utah

## DEPARTMENT OF NATURAL RESOURCES

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### Division of Oil, Gas and Mining

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Outgoing

C0070041

#3111

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April 16, 2009

Dave Shaver, Manager  
West Ridge Resources, Inc.  
P.O. Box 910  
East Carbon, Utah 84520-0910

Subject: Test Plot Evaluation and Soil Monitoring Reports, C/007/0041, West Ridge Mine,  
Task ID #3111

Dear Mr. Shaver:

The Division has reviewed the vegetation and soil analyses provided for the buried soil experimental practice. This amendment to Appendix 2-6 is not yet recommended for approval, because there are several details of the reclamation practice that should be included with this amendment to the MRP. We are returning the amendment to you for your further attention. Please address the deficiencies and resubmit the amendment including new C1 and C2 forms by no later than May 14, 2009. A deficiency list is attached.

Two important conclusions have been drawn from this information:

1. The vegetation analysis does indicate that there is no significant difference between the burial in-place soil treatment and the stockpiled/replaced topsoil.
2. Based on soils analysis from the truck loop location (sample site T3), where the sodium adsorption ratio has gone from 1.94 in 2001 to 31.31 in 2008, you should evaluate winter use of road salt and consider other ice treatment options to reduce salt accumulation of roadside areas.

The annual sampling program described in Addendum 2000 to Appendix 2-6 has been difficult for the Permittee and Division to remember. We recently sent a copy of the West Ridge Commitment list with the annual report form. Please remember your commitment to provide the soils testing results for sites T1, T2, T3 in the annual report.

Sincerely,

Daron R. Haddock  
Permit Supervisor

PWB/ss

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## DEFICIENCY LIST

### Task ID #3111

PB= Priscilla Burton

IW =Ingrid Wieser

**R645-301-121.100**, The MRP Appendix 2-6 must be updated to state that the test plots were reclaimed in September 2005 (refer to Inspection Report #737, dated September 6, 2005 for details). The following field changes to the work described in Appendix 2-6 should be noted in Appendix 2-6 or in an addendum to App. 2-6:

1. The test plots were reclaimed in 2005, six years after their creation, not five as is stated in the consultant's report.
2. The work began with removing stinging nettle seed heads from a patch of nettle that completely covered the Midfork Stockpile Area.
3. Certified noxious weed-free Alfalfa hay was gouged into the regraded site (copy of certification was attached to the Inspection Report #717).
4. There was no application of straw and wood fiber mulch tackifier.
5. There was no soil amendment added based upon visual observation of vegetative cover, but soil samples were taken to document the soil chemistry.
6. Soils were sampled from the testplots after they were regraded. The Brigham Young University Soil and Plant Analysis Lab analysis is dated October 4, 2005. The 2005 laboratory analyses must be provided.
7. The seeding was done on October 31, 2005.
8. According to information received by the Division on September 10, 2005, the seed mix outlined in Table 3-2B was modified due to availability: Sandberg bluegrass replaced muttongrass (*Poa fendleriana*) and neither canyon sweetvetch nor rocky mountain maple were commercially available and were not included in the seed mix.
9. Containerized plants shown on Table 3-2B were not available and not planted.
10. A vegetative analysis was conducted in August 2008 and results are presented in an addendum to Appendix 2-6.
11. A discussion of the predominance of stinging nettle in the Midfork Cut plot in the 2008 Mt. Nebo report should point out that the Midfork Stockpile Area (the source of the Midfork Cut topsoil) was covered with stinging nettle and the root propagules and seed were more than likely carried over with the soil.
12. The consultant's comparisons should recognize that the Strych Stockpile Area is the only plot that represents the experimental practice of burial and storage in place. A comparison of the Strych Stockpile Area and the Strych Fill area is the test of the conventional technique versus the experimental technique in the same soil type.
13. The Permittee should state whether Canyon Sweet Vetch was collected and seeded at the site. If so, the report should provide seed collection and/or storage information and a seeding date. [PB]

**R645-301-121.300**, The Permittee must file the annual soil sample analysis of T1, T2, and T3 with the annual report, as stated in the Addendum 2000 to Appendix 2-6. [PB]